

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

JUL 25 2024

ANTHONY TRUPIA,

Plaintiff,

v.

HERITAGE HARD ASSETS LLC; et al.,

JOAN KANE, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY Maia, DEPUTY

NO. CIV-24-498-SKC

J

Defendants.

NOTICE:

EXHIBITS TO PLAINTIFF'S COMPLAINT

Plaintiff, pro se, is admittedly confused about the purpose of pleading at this point and wishes to submit some exhibits to his original complaint. If this court will not accept these as exhibits, plaintiff hopes the court will accept them as supplemental attachments to his earlier submissions, docket numbers 61 and 76, "Opposition to All Motions to Dismiss" and the supporting brief, respectively. All research plaintiff has done has left him under the impression that exhibits in complaints should be either slim or unnecessary entirely, and so plaintiff did not include much of the evidence he has collected, which is ample. However, if plaintiff knew every last one of these allegations would be up for arguments in pleading, which seems contrary to the purpose of notice pleading, he would have attached them as exhibits. If this is not customary, plaintiff again argues that excessive motion practice in pleading is inappropriate, however often it is done, and attaching these exhibits now *feels* necessary because defendants repeatedly challenge this element of plaintiff's well-pleaded complaint. The arguments defendants continually make about this complaint being about "one call" fall flat.

Exhibit D is a partial list of the many spam and snowshoe calls that Plaintiff received just between July 2023 and November 2023 up until he was contacted by Reagan Gold Group, LLC. Plaintiff did not exaggerate when he says he has received hundreds of calls. This is not a complete list of the calls plaintiff has received and may not be a complete list of that time period either. Plaintiff hopes his entire call log can be subpoenaed from his phone provider to provide this court and all parties with a perfect record of the many calls he has received and has nothing to hide in his call log.

Exhibit E is a series of screenshots Plaintiff has taken as he has been bombarded by incoming spam and robocalls. As the court can see, all the common carriers are represented here. Onvoy and Level 3 are clearly the most common offenders of spam calls that Plaintiff managed to 'catch in the act' with screenshots of caller ID from the Truecaller App from the google play store.

Each of the defendants in this suit, from executives to telemarketing companies and common carrier companies, in various ways, is unjustly enriched by the flow of these calls and the many TCPA and OTSA violations, each is regularly unjustly enriched from this activity in connection with Oklahoma where Plaintiff resides and received all of these calls, and none of the defendants should be dismissed, nor should this complaint be dismissed.

Respectfully submitted,

/s Anthony Trupia

605 SE 21ST St.

Oklahoma City, OK 73129

516-984-0142

Trupiaar@gmail.com

Pro Se

Date: 7/24/2024